



CALPINE

May 3, 2004

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Mr. Lance Shaw
Compliance Project Manager
San Joaquin Valley Energy Center
Docket No. 01-AFC-22
California Energy Commission
1516 Ninth Street (MS-2000)
Sacramento, CA 95814-5512

**RE: SAN JOAQUIN VALLEY ENERGY CENTER
PETITION TO AMEND EMISSION REDUCTION CREDIT OFFSET
PACKAGE
01-AFC-22**

Dear Mr. Shaw:

Pursuant to Section 1769 (Post Certification Amendments and Changes) of the California Energy Commission ("CEC") Siting Regulations, San Joaquin Valley Energy Center, LLC ("SJVEC") hereby submits the attached Petition to amend SJVEC's emission reduction credits ("ERC") offset package. This filing is also intended to address Conditions of Certification AQ-C7 (regarding "double counting" and AQ-C13 (related to mitigation of SO₂ emissions). Related filings are being made, under separate cover, to:

- The CEC related to the Pastoria Energy Facility (99-AFC-7);
- The San Joaquin Valley APCD related to the Pastoria Energy Facility; and
- The San Joaquin Valley APCD related to the San Joaquin Valley Energy Center

In conjunction with this filing, we are seeking revisions to Conditions AQ-C10, AQ-C11 and AQ-C12 to reflect the revised offset package proposed herein. Further, we are seeking minor revisions to AQ-C13 and AQ-105 to reflect the allocation of emissions between calendar quarters based on the number of days in each quarter; total annual emissions remain unchanged from the levels previously approved by the Commission. (A slight error in condition AQ-105, which derives from a similar error in the FDOC, is proposed to be corrected in this amendment as well. The error relates to the quantity of VOC offsets required.)

Please do not hesitate to contact me at (925) 479-6729 should you have any questions regarding this submittal.

Respectfully Submitted,

Janet McCauley for Barbara McBride

Ms. Barbara McBride
Director of Safety, Health & Environment
Calpine Western and California Power Regions

attachments

xc: Ms. Nancy Tronaas, California Energy Commission (w/attachment)
Mr. Mike Argentine, San Joaquin Valley Energy Center (w/attachment)
Mr. Thomas Goff, SJVAPCD Southern Office (w/attachment)
Mr. David Warner, SJVAPCD Central Office (w/attachment)
Mr. Ed Pike, EPA Region IX (w/attachment)
Mr. Gary Rubenstein, Sierra Research (w/attachment)

PETITION TO AMEND SJVEC's ERC OFFSET PACKAGE

Pursuant to the California Code of Regulations Section 1769 (a)(1)(A), a description of the proposed amendment to SJVEC's ERC offset package is required.

With this petition, SJVEC is requesting a post-certification amendment to original ERC offset package approved by the Commission for this project. When the Commission recently approved the SJVEC, the Commission imposed a condition (AQ-C7) that required that Calpine file an application to amend either the ERC package for the Pastoria Energy Facility (PEF), or the SJVEC ERC package. Calpine has determined that amendments to both packages are required to ensure that all CEC requirements are addressed. Please see Attachment 1, Tables 1 and 2, which show the proposed ERCs for SJVEC and how those ERCs satisfy SJVAPCD offset and CEC mitigation requirements, respectively. In addition, we have enclosed in Attachment 1 Table 3, which reconciles Calpine's ERC holdings in the San Joaquin Valley APCD with the ERCs now proposed for PEF and SJVEC.

Further, SJVEC is seeking to revise Conditions AQ-C10, AQ-C11 and AQ-C12 to reflect the ERC certificates now proposed to be surrendered to satisfy SJVAPCD and CEC requirements. Attachment 1, Tables 1 and 2 show the certificates now proposed for use by SJVEC. Finally, SJVEC proposes to amend Conditions AQ-C13 and AQ-105 to reflect the distribution of project emissions by the number of days in each calendar quarter, rather than based on an equal distribution for each day. This minor change does not result in any change in maximum hourly, daily, or annual emissions from the project for any pollutant. (A slight error in condition AQ-105, which derives from a similar error in the FDOC, is proposed to be corrected in this amendment as well. The error relates to the quantity of VOC offsets required.)

Proposed revisions to these conditions are shown in Attachment 2.

SJVEC recognizes that the Commission has, for this project, required mitigation for all pollutants, without regard to APCD threshold levels. Attachment 1, Table 2 demonstrates that the ERCs required to satisfy APCD requirements will satisfy Commission mitigation requirements as well.

Pursuant to Section 1769 (1)(B) and (C), a discussion of the necessity for the proposed modification and whether the modification is based on information that was known by the petitioner during the certification proceeding is required.

The proposed changes to SJVEC's offset package are the result of business decisions made after the completion of SJVEC's certification process in light of the requirements imposed by the Commission. Furthermore, Conditions AQ-C7 and AQ-C13 require the submission of this modification for the SJVEC offset package. Revisions to AQ-C10, AQ-C11 and AQ-

C12 are necessary to conform those conditions to the revised offset package required by AQ-C7 and AQ-C13. Finally, revisions to conditions AQ-C13 and AQ-105 are requested to allow for the proper distribution of project emissions between calendar quarters. (A slight error in condition AQ-105, which derives from a similar error in the FDOC, is proposed to be corrected in this amendment as well. The error relates to the quantity of VOC offsets required.)

Pursuant to Section 1769 (1)(D), a discussion is required on whether the proposed modification is based upon new information that changes or undermines the assumptions, rationale, findings, or other bases of the Final Decision and explanation why it should be permitted.

The proposed amendment is the result of Conditions AQ-C7 and AQ-C13, business decisions made after the completion of SJVEC's certification process, and minor changes found to be necessary during a final review of the project's offset requirements.

Because SJVEC has confirmed with District Staff that all ERC certificates contained within both the current and revised SJVEC ERC packages are valid, SJVEC believes the proposed amendment does not change or undermine the assumptions, rationale, findings, or other bases of the Final Decision.

Pursuant to Section 1769 (1)(E), an analysis of the impacts the modifications may have on the environment and proposed measures to mitigate any significant adverse impacts is required.

As shown in Attachment 1, Table 2, the proposed offsets ensure that all net emission increases associated with the SJVEC project are fully mitigated at a ratio of at least 1.0:1, consistent with the demonstration made in the Commission's original decision. Therefore, the proposed changes do not result in any significant adverse environmental impact.

Pursuant to Section 1769 (1)(F), a discussion of the impact of the modification on the facility's ability to comply with applicable laws, ordinances, regulations, and standards is required.

SJVEC asserts the proposed changes contained in this Post-Certification Amendment Petition do not pose any impacts on the facility's ability to comply with all applicable laws, ordinances, regulations, and standards (LORS) subject to the provisions of Public Resources Code Section 25525. Attachment 1, Table 1 demonstrates that the revised SJVEC ERC package satisfies the requirements of the SJVAPCD.

Pursuant to Section 1769 (1)(G), a discussion of how the modification affects the public is required.

SJVEC further asserts the proposed modifications contained in this Post-Certification Amendment Petition will not cause any additional impacts or require additional mitigation measures and will not adversely affect the public.

Pursuant to Section 1769 (1)(H), a list of property owners potentially affected by the modification is provided below:

It is SJVEC's belief the proposed amendment is administrative in nature, therefore, no property owners will be affected by the modification proposed.

Pursuant to Section 1769 (1)(I), a discussion of the potential effect on nearby property owners, the public, and the parties in the applicable proceedings is required.

It is SJVEC's belief the proposed amendment will not result in any changes that would affect nearby property owners, the public, or any parties that participated in the application proceedings.

Consistent with the requirements of Section 1769 (a) (1)(A), SJVEC is requesting approval of the revised offset package. PEF is also requesting approval of conforming changes to Conditions AQ-C10, AQ-C11 and AQ-C12, and minor revisions to Conditions AQ-C13 and AQ-105.

Attachment 1

Emission Reduction Credit Summary Tables

Table 1

San Joaquin Valley Energy Center Emission Reduction Credits - SJVAPCD Requirements						
	Q1 (lbs)	Q2 (lbs)	Q3 (lbs)	Q4 (lbs)	Annual, lbs	
NOx	90	91	92	92	365	Exclusion
Project Emissions	131,913	133,379	134,845	134,845	534,982	20,000
Project Emissions Subject to Offset	126,982	128,393	129,804	129,804	514,982	
Required Offsets (1.5 ratio)	190,473	192,589	194,706	194,706	772,474	
S-1554-2	185,327	175,853	171,491	182,139	714,810	
S-1547-2	3,986	9,681	19,140	9,076	41,883	
S-1550-2	1,160	7,055	4,075	3,491	15,781	
Total ERCs Allocated to SJVEC	190,473	192,589	194,706	194,706	772,474	
Net Surplus NOx ERCs	0	0	0	0	0	
VOC						
Project Emissions	38,800	39,231	39,663	39,663	157,357	20,000
Project Emissions Subject to Offset	33,869	34,245	34,621	34,621	137,357	
Required Offsets (1.5 ratio)	50,803	51,368	51,932	51,932	206,035	
C-348-1	30,485	30,519	30,470	30,501	121,975	
N-303-1	5,716	6,073	6,542	6,512	24,843	
S-1549-1	6,162	6,230	6,299	6,298	24,989	
S-1665-1	8,440	8,546	8,621	8,621	34,228	
Total ERCs Allocated to SJVEC	50,803	51,368	51,932	51,932	206,035	
Net Surplus VOC ERC's	0	0	0	0	0	
SOx						
Project Emissions	10,762	10,882	11,001	11,001	43,646	54,750
Project Emissions Subject to Offset	0	0	0	0	0	
Required Offsets (1.5 ratio)	0	0	0	0	0	
N-270-5	10,765	10,885	11,004	11,004	43,658	
Total ERCs Allocated to SJVEC	10,765	10,885	11,004	11,004	43,658	
Surplus SOx ERC's	10,765	10,885	11,004	11,004	43,658	
SOx ERCs Used to Offset PM10	10,765	10,885	11,004	11,004	43,658	
Net Surplus SOx ERCs	0	0	0	0	0	
PM10						
Project Emissions	72,527	73,333	74,138	74,138	294,136	29,200
Project Emissions Subject to Offset	65,327	66,053	66,778	66,778	264,936	
Required Offsets (1.5 ratio)	97,990	99,079	100,168	100,168	397,405	
C-347-4	50,845	67,976	8,408	42,056	169,285	
C-448-4	1,067	1,067	1,067	1,067	4,268	
C-449-4	82	28	373	674	1,157	
N-208-4	715	8,177	6,581	715	16,188	
N-297-4	0	0	101	66,394	66,495	
S-1577-4	489	0	0	23,085	23,574	
S-1578-4	421	0	176	46,954	47,551	
S-1666-4	0	0	0	11,831	11,831	
S-1683-4	0	0	0	1,462	1,462	
S-1684-4	0	0	0	11,843	11,843	
S-1687-4	0	0	610	0	610	
S-1689-4	0	0	0	2,604	2,604	
S-1690-4	0	0	0	1,830	1,830	
S-1691-4	0	0	0	856	856	
S-1692-4	0	0	987	14,019	15,006	
S-1693-4	1,091	1,103	1,115	1,115	4,424	
Total ERCs Allocated to SJVEC	54,710	78,351	19,418	226,505	378,984	
Net PM10 Offsets Available (Needed)	-43,280	-20,728	-80,750	126,337	-18,421	
Redistribute 4th Quarter ERCs	38,738	16,135	76,107	-130,980	0	
Net PM10 Offsets Available (Needed)	-4,542	-4,593	-4,643	-4,643	-18,421	
Surplus SOx ERCs used	4,542	4,593	4,643	4,643	18,421	
Net Surplus PM10 ERCs	0	0	0	0	0	
						Ratio w/distance
						2.37

Table 2

San Joaquin Valley Energy Center Emission Reduction Credits - CEC Requirements						
	Q1 (lbs)	Q2 (lbs)	Q3 (lbs)	Q4 (lbs)	Annual, lbs	
NOx	90	91	92	92	365	Exclusion
Project Emissions	132,139	133,607	135,076	135,076	535,898	0
Required Offsets (1.0 ratio)	132,139	133,607	135,076	135,076	535,898	
S-1554-2	185,327	175,853	171,491	182,139	714,810	
S-1547-2	3,986	9,681	19,140	9,076	41,883	
S-1550-2	1,160	7,055	4,075	3,491	15,781	
Total ERCs Allocated to SJVEC	190,473	192,589	194,706	194,706	772,474	
Net Surplus NOx ERCs	58,334	58,982	59,630	59,630	236,576	
VOC						
Project Emissions	38,882	39,314	39,746	39,746	157,688	0
Required Offsets (1.0 ratio)	38,882	39,314	39,746	39,746	157,688	
C-348-1	30,485	30,519	30,470	30,501	121,975	
N-303-1	5,716	6,073	6,542	6,512	24,843	
S-1549-1	6,162	6,230	6,299	6,298	24,989	
S-1665-1	8,440	8,546	8,621	8,621	34,228	
Total ERCs Allocated to SJVEC	50,803	51,368	51,932	51,932	206,035	
Net Surplus VOC ERCs	11,921	12,054	12,186	12,186	48,347	
SOx						
Project Emissions	10,765	10,885	11,004	11,004	43,658	0
Required Offsets (1.0 ratio)	10,765	10,885	11,004	11,004	43,658	
N-270-5	10,765	10,885	11,004	11,004	43,658	
Total ERCs Allocated to SJVEC	10,765	10,885	11,004	11,004	43,658	
Surplus SOx ERC's	0	0	0	0	0	
SOx ERCs Used to Offset PM10	0	0	0	0	0	
Net Surplus SOx ERCs	0	0	0	0	0	
PM10						
Project Emissions	72,536	73,342	74,148	74,148	294,173	0
Required Offsets (1.0 ratio)	72,536	73,342	74,148	74,148	294,173	
C-347-4	50,845	67,976	8,408	42,056	169,285	
C-448-4	1,067	1,067	1,067	1,067	4,268	
C-449-4	82	28	373	674	1,157	
N-208-4	715	8,177	6,581	715	16,188	
N-297-4	0	0	101	66,394	66,495	
S-1577-4	489	0	0	23,085	23,574	
S-1578-4	421	0	176	46,954	47,551	
S-1666-4	0	0	0	11,831	11,831	
S-1683-4	0	0	0	1,462	1,462	
S-1684-4	0	0	0	11,843	11,843	
S-1687-4	0	0	610	0	610	
S-1689-4	0	0	0	2,604	2,604	
S-1690-4	0	0	0	1,830	1,830	
S-1691-4	0	0	0	856	856	
S-1692-4	0	0	987	14,019	15,006	
S-1693-4	1,091	1,103	1,115	1,115	4,424	
Total ERCs Allocated to SJVEC	54,710	78,351	19,418	226,505	378,984	
Net PM10 Offsets Available (Needed)	-17,826	5,009	-54,730	152,357	84,811	
Redistribute 4th Quarter ERCs	17,826	0	54,730	-72,556	0	
Net PM10 Offsets Available (Needed)	0	5,009	0	79,802	84,811	
Surplus SOx ERCs used	0	0	0	0	0	
Net Surplus PM10 ERCs	0	5,009	0	79,802	84,811	Ratio w/o distance 1.87

Table 3

Calpine Corporation San Joaquin Valley ERC Reconciliation																					
Certificate		Total Certificate Value (lbs)					Allocated to Pastoria					Allocated to SJVEC (lbs)					Remaining Certificate Value (lbs)				
Owner	Number	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total	Q1	Q2	Q3	Q4	Total
NOx ERCs																					
Calpine	C-375-2	12,500	12,500	12,500	12,500	50,000					50,000										
Calpine	C-376-2	54,301	54,301	54,301	54,301	217,204					217,204										
Calpine	N-195-2	41,829	41,829	41,829	41,829	167,315					167,315										
Pastoria	S-1547-2	3,986	9,681	19,140	9,076	41,883		3,986	9,681	19,140	9,076					41,883					
Pastoria	S-1550-2	1,160	7,055	4,075	3,491	15,781		1,160	7,055	4,075	3,491					15,781					
Pastoria	S-1554-2	306,647	310,056	313,464	313,464	1,243,631		11,395	12,719	14,051	14,053	52,208		185,327	175,853	171,491	182,139	174,810	109,935	121,484	127,922
Totals		420,423	435,422	445,309	434,660	1,735,814	120,015	121,349	122,681	122,682	486,727	190,473	192,589	194,706	194,706	772,474	109,935	121,484	127,922	117,272	476,613
VOC ERCs																					
Calpine	C-348-1	30,485	30,519	30,470	30,501	121,975							30,485	30,519	30,470	30,501	121,975				
Calpine	N-303-1	53,352	43,607	47,208	38,670	182,837							5,717	6,073	6,542	6,514	24,845	47,635	37,534	40,668	32,156
Pastoria	S-1549-1	82,952	83,873	84,795	84,794	336,414							6,161	6,230	6,299	6,296	24,986				
Calpine	S-1865-1	8,440	8,546	8,621	8,621	34,228							8,440	8,546	8,621	8,621	34,228				
Totals		175,229	166,545	171,094	162,596	675,454	76,791	77,643	78,496	78,496	311,428	50,803	51,368	51,932	51,932	206,036	47,635	37,534	40,668	32,156	157,991
SOx ERCs																					
Calpine	N-270-5	395,000	344,100	298,948	298,948	1,336,996	167,792	169,857	171,521	171,521	680,491	10,765	10,885	11,004	11,004	43,658	216,443	163,568	116,423	116,423	612,847
Totals		395,000	344,100	298,948	298,948	1,336,996	167,792	169,857	171,521	171,521	680,491	10,765	10,885	11,004	11,004	43,658	216,443	163,568	116,423	116,423	612,847
PM10 ERCs																					
Calpine	C-347-4	50,845	67,976	8,408	42,056	169,285							50,845	67,976	8,408	42,056	169,285				
Calpine	C-448-4	1,067	1,067	1,067	1,067	4,268							1,067	1,067	1,067	1,067	4,268				
Calpine	C-449-4	82	28	373	674	1,157							82	28	373	674	1,157				
Calpine	N-208-4	715	8,177	6,591	715	16,188							715	8,177	6,591	715	16,188				
Calpine	N-297-4	0	0	101	66,394	66,495							0	0	101	66,394	66,495				
Calpine	S-1577-4	489	0	0	23,065	23,574							489	0	0	23,065	23,574				
Calpine	S-1578-4	421	0	176	46,954	47,551							421	0	176	46,954	47,551				
Calpine	S-1866-4	0	0	0	18,238	18,238							0	0	0	11,831	11,831				
Calpine	S-1863-4	0	0	0	1,462	1,462							0	0	0	1,462	1,462				
Calpine	S-1864-4	0	0	0	11,843	11,843							0	0	0	11,843	11,843				
Calpine	S-1867-4	0	0	0	610	610							0	0	0	610	610				
Calpine	S-1869-4	0	0	0	2,604	2,604							0	0	0	2,604	2,604				
Calpine	S-1890-4	0	0	0	1,830	1,830							0	0	0	1,830	1,830				
Calpine	S-1891-4	0	0	0	866	866							0	0	0	866	866				
Calpine	S-1892-4	0	0	0	987	14,019							0	0	0	987	14,019	15,006			
Calpine	S-1893-4	1,091	1,103	1,115	1,115	4,424							1,091	1,103	1,115	1,115	4,424				
Totals		54,710	78,351	19,418	232,912	365,391	0	0	0	0	0	54,710	78,351	19,418	226,505	378,964	0	0	0	0	6,407
Totals																					
Calpine	N-270-5	395,000	344,100	298,948	298,948	1,336,996	167,792	169,857	171,521	171,521	680,491	10,765	10,885	11,004	11,004	43,658	216,443	163,568	116,423	116,423	612,847
Totals		395,000	344,100	298,948	298,948	1,336,996	167,792	169,857	171,521	171,521	680,491	10,765	10,885	11,004	11,004	43,658	216,443	163,568	116,423	116,423	612,847
Calpine	C-347-4	50,845	67,976	8,408	42,056	169,285							50,845	67,976	8,408	42,056	169,285				
Calpine	C-448-4	1,067	1,067	1,067	1,067	4,268							1,067	1,067	1,067	1,067	4,268				
Calpine	C-449-4	82	28	373	674	1,157							82	28	373	674	1,157				
Calpine	N-208-4	715	8,177	6,591	715	16,188							715	8,177	6,591	715	16,188				
Calpine	N-297-4	0	0	101	66,394	66,495							0	0	101	66,394	66,495				
Calpine	S-1577-4	489	0	0	23,065	23,574							489	0	0	23,065	23,574				
Calpine	S-1578-4	421	0	176	46,954	47,551							421	0	176	46,954	47,551				
Calpine	S-1866-4	0	0	0	18,238	18,238							0	0	0	11,831	11,831				
Calpine	S-1863-4	0	0	0	1,462	1,462							0	0	0	1,462	1,462				
Calpine	S-1864-4	0	0	0	11,843	11,843							0	0	0	11,843	11,843				
Calpine	S-1867-4	0	0	0	610	610							0	0	0	610	610				
Calpine	S-1869-4	0	0	0	2,604	2,604							0	0	0	2,604	2,604				
Calpine	S-1890-4	0	0	0	1,830	1,830							0	0	0	1,830	1,830				
Calpine	S-1891-4	0	0	0	866	866							0	0	0	866	866				
Calpine	S-1892-4	0	0	0	987	14,019							0	0	0	987	14,019	15,006			
Calpine	S-1893-4	1,091	1,103	1,115	1,115	4,424							1,091	1,103	1,115	1,115	4,424				
Totals		54,710	78,351	19,418	232,912	365,391	0	0	0	0	0	54,710	78,351	19,418	226,505	378,964	0	0	0	0	6,407

Attachment 2

Proposed Changes to Conditions of Certification

AQ-C10 ERC Certificate Numbers ~~S-1547-2~~, ~~S-1340-2~~, ~~S-1280-2~~, ~~N-272~~, ~~S-1550-2~~, and S-1554-2 shall be used to supply the required **NO_x** offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. The certificates identified in this condition shall be surrendered only after demonstrating compliance with Conditions **AQ-C7** and **AQ-C9**.

Verification: At least 60 days prior to commencing turbine first fire, the project owner shall surrender the identified ERC certificates and in the amounts shown in **AQ-105** to the District and provide documentation of that surrender to the CPM. Changes to the offsetting proposal must be provided to the District and CPM for review, public noticing, and approval.

AQ-C11 ERC Certificate Number C-348-1, N-303-1, ~~S-1549-1~~ and S-1665-1 shall be used to supply the required **VOC** offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. The certificates identified in this condition shall be surrendered only after demonstrating compliance with Conditions **AQ-C7** and **AQ-C9**.

Verification: At least 60 days prior to commencing turbine first fire, the project owner shall surrender the identified ERC certificates and in the amounts shown in **AQ-105** to the District and provide documentation of that surrender to the CPM. Changes to the offsetting proposal must be provided to the District and CPM for review, public noticing, and approval.

AQ-C12 ERC Certificate Numbers C-347-4, S-1577-4, S-1578-4, S-1666-4, ~~S-1682-4~~, S-1683-4, S-1684-4, ~~S-1685-4~~, ~~S-1686-4~~, S-1687-4, ~~S-1688-4~~, S-1689-4, S-1690-4, S-1691-4, S-1692-4, S-1693-4, N-297-4, ~~C-447-4~~, C-448-4, C-449-4, and ~~N-208-4~~, and ~~N-270-5~~ shall be used to supply the required **PM₁₀** offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct.

Verification: At least 60 days prior to commencing turbine first fire, the project owner shall surrender the identified ERC certificates and in the amounts shown in **AQ-105** to the District and provide documentation of that surrender to the CPM. Changes to the offsetting proposal must be provided to the District and CPM for review, public noticing, and approval.

AQ-C13 The project owner shall surrender SO₂ ERC certificates from the SJVAPCD ERC bank in the amount of no less than ~~10,908 pounds per quarter~~ the following: Q1: 10,762 pounds, Q2: 10,882 pounds, Q3: 11,001 pounds, Q4: 11,001 pounds.

Verification: At least 60 days prior to commencing turbine first fire, the project owner shall surrender the ERC certificates in the required amounts to the District and provide documentation of that surrender to the CPM.

AQ-105 Before initial operation of C-3959-1-0, C-3959-2-0, C-3959-3-0, C-3959-4-0, and C-3959-5-0, emission offsets shall be provided to offset the following increases in: PM₁₀-Q1: 66,234 65,327 lb, Q2: 66,234 66,053 lb, Q3: 66,234 66,778 lb, and Q4: 66,234 66,778 lb; NO_x (as NO₂) - Q1: 128,746 126,982 lb, Q2: 128,746 128,393 lb, Q3: 128,746 129,804 lb, and Q4: 128,746 129,804 lb; VOC - Q1: 34,378 33,869 lb, Q2: 34,378 34,245 lb, Q3: 34,378 34,621 lb, and Q4: 34,378 34,621 lb. Offsets shall be provided at the appropriate distance ratio specified in Rule 2201. [District Rule 2201]

Verification: The project owner shall submit copies of the surrendered ERC certificates to the CPM at least 30 days prior to first fire of the any combustion turbine at the SJVEC site.